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December 20, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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VIA COURIER

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals Complex
445 12th Street, S.W.
Washington, D.C. 20554

Stop Code 1800D5
Attn: Allocations Branch

Re: KRSK(FM), Salem, Oregon
Petition For Rulemaking To Change Community
of License From Salem to Molalla, Oregon

Dear Ms. Salas:

On behalf of Entercom Portland License, LLC, licensee of radio station KRSK(FM), Salem, Oregon, we hereby submit an original and four (4) copies of a Petition for Rulemaking seeking to amend the FM Table of Allotments to reallocate Channel 286C from Salem to Molalla, Oregon and to modify KRSK(FM)'s license to specify Molalla as its community of license. No fee is required for this filing.

LEVENTHAL, SENTER & LERMAN P.L.L.C.

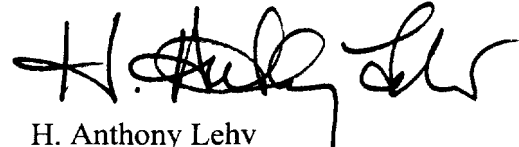
Ms. Magalie Roman Salas

December 20, 2000

Page 2

If any questions should arise concerning this filing, please contact the undersigned counsel.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "H. Anthony Lehv", with a stylized flourish at the end.

H. Anthony Lehv

Elizabeth N. Alexander

(Admitted to Illinois, Supervised

By Members of the DC Bar)

Enclosure

cc: John C. Donlevie, Esq.
Martin D. Hadfield
Erik C. Swanson
Jack Hutchison

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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In the Matter of

)

)

Amendment of Section 73.202(b)

)

Table of Allotments,

)

FM Broadcast Stations.

)

(Salem and Molalla, Oregon)

)

)

MM Docket No. _____

RM- _____

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

To: Chief, Allocations Branch

PETITION FOR RULEMAKING

Entercom Portland License, LLC ("EPL"), licensee of Station KRSK(FM), Channel 286C, Salem, Oregon, by its attorneys, and pursuant to Section 1.420(i) of the Commission's rules, hereby submits this Petition for Rulemaking seeking to change the community of license of Station KRSK(FM) from Salem to Molalla, Oregon. The proposed change would result in a preferential arrangement of allotments and would provide the city of Molalla with its first local transmission service.

EPL accordingly requests that the Commission issue a Notice of Proposed Rulemaking proposing to modify the FM Table of Allotments to reallocate Channel 286C to Molalla and to modify the license of Station KRSK(FM) to specify Molalla as its community of license. EPL will file an application to implement the change if Channel 286C is allocated to Molalla.

DISCUSSION

Under Section 1.420(i) of the Commission's rules and the Commission's policies relating to proposed changes to a station's community of license, the Commission may modify a station's license to specify a new community of license if: (a) the proposed community of license qualifies under FCC policies; (b) the new allotment would be mutually exclusive with the old allotment; (c) considering the totality of factors, the new allotment would result in a preferential arrangement of allotments; and (d) the relocation would not deprive a community of its sole local transmission outlet. *Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 4870 (1989), *recon. granted in part*, 5 FCC Rcd 7094 (1990), *LaGrange and Rollingwood, Texas*, 10 FCC Rcd 3337 (1995). The community of license change proposed by EPL satisfies each of these criteria.

I. Molalla Is a Community Deserving of an FM Channel Allotment.

Under Section 307(b) of the Communications Act of 1934, as amended (the "Act"), the Commission may award licenses to those applicants who propose to serve a particular community. The Commission defines a "community" as a "geographically identifiable population grouping." *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88, 101 (1982) ("*FM Order*"). The Commission has further explained "[t]he fact that a location is incorporated or is otherwise listed in the Census is generally sufficient to confer community status upon it." *Kenansville, Florida*, 2 FCC Rcd 7194, 7195 (1987) (subsequent history omitted), *citing Vimville, Mississippi*, 55 RR 2d 256, 258 (1983). The city of Molalla was

incorporated in 1913 and is listed in the 1990 Census as having a population of 3,651 persons.¹

Accordingly, under the principles explained in *Kenansville*, the Commission should easily conclude that Molalla is a community for purposes of satisfying Section 307(b) of the Act.

Molalla possesses numerous other indicia of "community status" under the Commission's precedent. Molalla is governed by an elected Mayor and a six-member City Council. The city maintains its own police and fire departments and provides residents with water and sewer services. Molalla has its own zip code (97038). The city maintains parks and recreation centers, including the Molalla Adult Center, the Molalla Youth Center and the Molalla Public Library. Molalla is home to over 175 local businesses and fifteen religious institutions and has its own independent school district with an elementary school, middle school and high school. Every July, the city hosts the "Molalla Buckeroo," a four-day event which has attracted thousands of visitors for more than 80 years. These myriad indicia of Molalla's independence and local cohesion establish that Molalla is a community deserving a first local transmission service. *See Daingerfield and Ore City, Texas*, 13 FCC Rcd 20950 (Allocations Branch 1998) (existence of police and fire departments, city utilities, independent school district and city government qualifies city with population of 898 residents as a Section 307(b) community).

II. The New Allotment is Mutually Exclusive with the Existing Allotment.

Station KRSK is licensed to operate on Channel 286C at Salem. EPL seeks reallocation of the channel from Salem to Molalla, and a modification of the license for Station KRSK

¹ According to Molalla's Internet site (www.molalla.net/~city) as of 1999, Molalla's population was 5,670 persons.

accordingly, but no change in transmitter site is proposed.² Channel 286C can be allotted to Molalla in conformity with all applicable minimum spacing requirements of Section 73.207(a) of the Commission's rules with respect to other stations and allotments. Engineering Statement at 1. Because the minimum required spacing between co-channel Class C stations is 290 kilometers (180 miles), 47 C.F.R. §73.207(b)(1), and Molalla is located only approximately 43 kilometers from Salem, the new allotment would be mutually exclusive with the Station's existing allotment and the Commission may, therefore, modify the license of Station KRSK to specify the change in community of license requested by EPL. 47 C.F.R. § 1.420(i).

EPL proposes reference coordinates for the Molalla allotment at longitude 45-00-35 N, latitude 122-20-17 W. Engineering Statement at 2. From these coordinates, which are Station KRSK's current licensed facilities, Station KRSK would comply with Section 73.315 of the rules by providing line-of-sight coverage to Molalla, and the entire community of Molalla would be encompassed by Station KRSK's principal community (70 dBu) signal contour. Engineering Statement at 2.

III. The Proposed Change Would Result In a Preferential Arrangement of Allotments.

Station KRSK(FM) would be Molalla's first full-service local transmission service. After the proposed reallocation of this channel, Salem will continue to be served by three full-time AM

² EPL has had a construction permit application (FCC File No. BPH-951215ID) pending since 1995, which was last amended on November 18, 1999. EPL can construct the facilities proposed in the construction permit without regard to the proposed community of license change, and EPL intends to construct those facilities if the construction permit is granted. EPL notes that full city coverage of Molalla will be achieved from the site specified in the pending application.

stations: KCCS(AM), KSLM(AM) and KBZY(AM). Removing Channel 286C from Salem and allotting it to Molalla therefore will result in a preferential arrangement of allotments.

The FM allotment priorities are: (1) first full-time aural service; (2) second full-time aural service; (3) first local service; and (4) other public interest matters. Equal weight is given to priorities (2) and (3). *FM Order*, 90 FCC 2d 88, 101 (1982). Retaining the Channel 286C allotment at Salem would serve only priority (4), other public interest matters, while allotting Channel 286C to Molalla would serve priority (3) by providing first local transmission service to Molalla. Because no transmitter site change is proposed to accommodate the change in community of license of Station KRSK, there will be no gain or loss areas associated with the proposed reallocation. Engineering Statement at 2.

The 70 dBu signal contour of Station KRSK currently encompasses more than 50 % of the Portland-Vancouver, Oregon Urbanized Area and the Salem, Oregon Urbanized Area. Engineering Statement at 2. Because Station KRSK will continue to provide city grade service to more than 50 % of the Portland-Vancouver and Salem Urbanized areas if the change in community of license is granted, EPL is not required to submit a *Tuck* analysis. *See Moncks Corner, Kiawah Island, and Sampit, South Carolina*, 15 FCC Rcd 8973, 8982 (Allocations Branch 2000), *East Los Angeles, Long Beach, and Frazier Park, California*, 10 FCC Rcd 2864, 2868 (Allocations Branch 1995) (no *Tuck* analysis required when moving from one community of license serving over 50 % of an Urbanized Area to a new community of license also serving over 50 % of an Urbanized Area).

Accordingly because the reallocation of Station KRSK from Salem to Molalla, Oregon satisfies the Commission's change in community of license policies, it is deserving of first local

transmission service. The Commission should consider allotting Channel 286C to Molalla as set forth below:

Community	Channel Number	
	Present	Proposed
Salem, Oregon	286C	-----
Molalla, Oregon	-----	286C

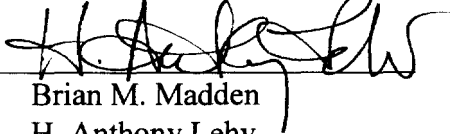
CONCLUSION

Molalla, Oregon is an incorporated community of at least 3,600 residents and is deserving of a first local transmission service. If Station KRSK is reallocated to Molalla, there will be no gain or loss areas and Salem will continue to be the community of license of three full-time AM stations. As a consequence, EPL's proposal results in a preferential arrangement of allotments.

In light of these facts, the Commission should issue a Notice of Proposed Rule Making proposing to reallocate Channel 286C from Salem to Molalla.

Respectfully submitted,

Entercom Portland License, LLC

By: 
Brian M. Madden
H. Anthony Lehv
Elizabeth N. Alexander
(Admitted in Illinois, Supervised
By Members of the DC Bar)

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December 20, 2000

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ENGINEERING STATEMENT

PETITION FOR RULEMAKING TO
AMEND SECTION 73.202 OF THE RULES
AND REGULATIONS FOR THE FEDERAL
COMMUNICATIONS COMMISSION

TO ASSIGN FM CHANNEL 286C
FOR USE AT MOLALLA, OREGON

ENTERCOM PORTLAND LICENSE, LLC

DEC 2000

ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of Entercom Portland License, LLC ("Entercom"), licensee of FM station KRSK, in support of a Petition for Rulemaking to amend §73.202 of the Commission's Rules to reallocate Channel 286C from Salem to Molalla, Oregon, and to modify the license of KRSK to specify operation at Molalla.

As outlined in the attached spacing study, Channel 286C can be assigned for use at Molalla in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments. For this study the reference coordinates of the licensed KRSK facility (NL 45° 00' 35" x WL 122° 20' 17") have been used. The attached contour map demonstrates that 100% of Molalla is encompassed by the 70 dBu contour of the licensed KRSK facility.

Reallocation of KRSK from Salem to Molalla will provide the City of Molalla, having a 1990 Census population 3,651 persons, with its first local aural service. Salem will retain local aural service from full-time AM stations KCCS 1220 kHz, KSLM 1390 kHz, and KBZY 1490 kHz.

Gain and Loss Areas

No transmitter site change is required to accommodate the change in KRSK's community of license from Salem to Molalla. Therefore, there will be no gain or loss areas associated with the proposed reallocation.

Hatfield & Dawson Consulting Engineers

No Tuck Analysis Necessary

Molalla is not located within either the Portland-Vancouver or Salem Urbanized Areas. KRSK currently provides 70 dBu service to 100% of the Salem Urbanized Area, and to about 90% of the Portland-Vancouver Urbanized Area. Because no transmitter site change is contemplated by this petition, these circumstances will not be changed by the proposed reallocation of Channel 286C from Salem to Molalla, and no "Tuck" analysis is believed to be necessary as a part of this petition. However, should the Commission determine that a "Tuck" analysis is required, Entercom will furnish that information as a part of its comments.

KRSK Application

Entercom has an application pending (FCC File No. BPH-19951215ID) to relocate KRSK to a new transmitter site 7 kilometers northeast of Molalla. (The coordinates of Molalla are NL 45° 08' 51" x WL 122° 34' 33".) The application site's close proximity guarantees that operation at that site would provide 70 dBu service to 100% of Molalla. An additional spacing study is included to demonstrate that operation of KRSK at the site specified in BPH-19951215ID would be fully-spaced to all existing facilities and allotments. It should be noted that this additional spacing study is included for reference only. Entercom proposes use of the licensed KRSK site as the allotment site for Channel 286C at Molalla.

Hatfield & Dawson Consulting Engineers

SEARCH PARAMETERS

FM Database Date: 001010

Channel: 286C 105.1 MHz

Page 1

Latitude: 45 0 35

Longitude: 122 20 17

Safety Zone: 50 km

Job Title: MOLALLA 286C ALLOTMENT SITE

Call Status	City St	FCC File No.	Channel Freq.	ERP(kw) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KMCQ LIC	THE DALLES OR	BLH-850916KS	283C 104.5	100.000 610.0	45-42-41 121-07-07	50.3	123.33 18.33	105 CLEAR
KMCQ APP	THE DALLES OR	BPH-990512IC	283C 104.5	100.000 609.0	45-42-44 121-06-50	50.3	123.68 18.68	105 CLEAR
KMCQ APP	THE DALLES OR	BPH-990512IC	283C 104.5	100.000 609.0	45-42-44 121-06-50	50.3	123.68 18.68	105 CLEAR
KDUK-FM LIC	FLORENCE OR	BLH-890920KC	284C 104.7	63.000 709.0	44-17-35 123-32-15	230.4	124.08 19.08	105 CLEAR
K285DH LIC	BEND OR	BLFT-870324TH	285D 104.9	0.028 DA 301.0	44-04-40 121-19-49	142.0	130.92 0.00	0 TRANS
K285DN LIC	CANNON BEACH OR	BLFT-880909TC	285D 104.9	0.055 DA 88.0	45-52-42 123-57-15	308.0	159.08 0.00	0 TRANS
K285CV LIC	MADRAS, ETC. OR	BLFT-880802TG	285D 104.9	0.079 DA 174.0	44-39-57 121-06-47	111.2	104.13 0.00	0 TRANS
K285DC LIC	MAUPIN OR	BLFT-880208TC	285D 104.9	0.045 DA 573.0	45-18-45 121-02-45	71.2	107.03 0.00	0 TRANS
KFNK LIC	EATONVILLE WA	BLH-950814KD	285A 104.9	2.500 151.0	46-50-24 122-15-27	1.7	203.53 38.53	165 CLEAR
KFNK CP	EATONVILLE WA	BPH-000517AEL	285A 104.9	5.100 109.0	46-50-24 122-15-27	1.7	203.53 38.53	165 CLEAR
KAKT LIC	PHOENIX OR	BLH-901001KD	286C1 105.1	52.000 166.0	42-25-41 123-00-04	190.7	291.77 21.77	270 CLEAR
KRSK LIC	SALEM OR	BMLH-990521KA	286C 105.1	100.000 576.0	45-00-35 122-20-17	0.0	0.00 -290.00	290 SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 270 KM								
KRSK APP	SALEM OR	BPH-951215ID	286C 105.1	100.000 439.0	45-11-00 122-30-00	326.7	23.12 -266.88	290 SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 270 KM								
KRSKaux CP	SALEM OR	BXP-000112ABM	286C 105.1	100.000 516.0	45-00-35 122-20-17	0.0	0.00 0.00	0 AUX

SEARCH PARAMETERS

FM Database Date: 001010

Channel: 286C 105.1 MHz

Page 2

Latitude: 45 0 35

Longitude: 122 20 17

Safety Zone: 50 km

Job Title: MOLALLA 286C ALLOTMENT SITE

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KONA-FM LIC	KENNEWICK WA	BLH-940525KA	287C 105.3	100.000 347.0	46-05-51 119-11-30	62.6	273.82 32.82	241 CLEAR
KONAaux LIC	KENNEWICK WA	BLH-940812KZ	287C 105.3	10.000 301.0	46-05-51 119-11-30	62.6	273.82 0.00	0 AUX
KONA-FM APP	KENNEWICK WA	BPH-980911IB	287C 105.3	100.000 441.0	46-05-58 119-07-40	63.0	278.40 37.40	241 CLEAR
KONAaux APP	KENNEWICK WA	BPH-980911ID	287C 105.3	10.000 389.0	46-05-58 119-07-40	63.0	278.40 0.00	0 AUX
KDEP CP MOD	DEPOE BAY OR	BMPH-960910IA	288C3 105.5	3.000 291.0	44-45-24 124-02-50	258.8 SS	137.94 41.94	96 CLEAR
KCGB-FM LIC	HOOD RIVER OR	BLH-781124AB	288A 105.5	3.000 -140.0	45-42-07 121-32-10	38.9	99.33 4.33	95 CLOSE
K288DI LIC	LINCOLN CITY OR	BLFT-860516TC	288D 105.5	0.054 DA 300.0	44-52-30 123-59-00	264.0	130.72 0.00	0 TRANS
K288EC LIC	SWEET HOME OR	BLFT-871229TG	288D 105.5	0.051 DA 923.0	44-29-02 122-34-55	198.3	61.54 0.00	0 TRANS
KLYK LIC	LONGVIEW WA	BLH-941228KE	288A 105.5	0.700 262.0	46-09-52 122-51-13	342.8 SS	134.50 39.50	95 CLEAR
KLYK APP	LONGVIEW WA	BPH-960129IC	288A 105.5	6.000 -17.0	46-05-01 122-55-11	339.4	127.71 32.71	95 CLEAR
KLYK APP	LONGVIEW WA	BPH-960129IC	288A 105.5	6.000 100.0	46-05-01 122-55-11	339.4	127.71 32.71	95 CLEAR
KQAK LIC	BEND OR	BLH-000414ACD	289C1 105.7	40.000 180.0	44-04-40 121-19-49	142.0	130.92 25.92	105 CLEAR
KQAK CP	BEND OR	BPH-000414ACF	289C1 105.7	40.000 180.0	44-04-40 121-19-49	142.0	130.92 25.92	105 CLEAR

===== BEGINNING SEARCH OF SECONDARY DATABASE =====

SEARCH PARAMETERS

FM Database Date: 001010

Channel: 286C 105.1 MHz

Page 3

Latitude: 45 0 35

Longitude: 122 20 17

Safety Zone: 50 km

Job Title: MOLALLA 286C ALLOTMENT SITE

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KFNK	EATONVILLE		285C3	0.000	46-50-19	3.0	203.57	176
VACANT	WA RM-9269		104.9	0.0	122-11-53		27.57	CLEAR

==== END OF FM SPACING STUDY FOR CHANNEL 286 =====

SEARCH PARAMETERS

FM Database Date: 001010

Channel: 286C 105.1 MHz

Page 1

Latitude: 45 8 51

Longitude: 122 34 33

Safety Zone: 50 km

Job Title: KRSK APPLICATION BPH-19951215ID

Call Status	City St	FCC File No.	Channel Freq.	ERP(kw) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KMCQ LIC	THE DALLES OR	BLH-850916KS	283C 104.5	100.000 610.0	45-42-41 121-07-07	60.6	130.12 25.12	105 CLEAR
KMCQ APP	THE DALLES OR	BPH-990512IC	283C 104.5	100.000 609.0	45-42-44 121-06-50	60.7	130.49 25.49	105 CLEAR
KMCQ APP	THE DALLES OR	BPH-990512IC	283C 104.5	100.000 609.0	45-42-44 121-06-50	60.7	130.49 25.49	105 CLEAR
KDUK-FM LIC	FLORENCE OR	BLH-890920KC	284C 104.7	63.000 709.0	44-17-35 123-32-15	219.0	121.74 16.74	105 CLEAR
K285DH LIC	BEND OR	BLFT-870324TH	285D 104.9	0.028 DA 301.0	44-04-40 121-19-49	139.9	154.61 0.00	0 TRANS
K285DN LIC	CANNON BEACH OR	BLFT-880909TC	285D 104.9	0.055 DA 88.0	45-52-42 123-57-15	307.6	134.90 0.00	0 TRANS
K285CV LIC	MADRAS, ETC. OR	BLFT-880802TG	285D 104.9	0.079 DA 174.0	44-39-57 121-06-47	114.4	127.32 0.00	0 TRANS
K285DC LIC	MAUPIN OR	BLFT-880208TC	285D 104.9	0.045 DA 573.0	45-18-45 121-02-45	80.8	121.55 0.00	0 TRANS
KFNK LIC	EATONVILLE WA	BLH-950814KD	285A 104.9	2.500 151.0	46-50-24 122-15-27	7.3	189.73 24.73	165 CLEAR
KFNK CP	EATONVILLE WA	BPH-000517AEL	285A 104.9	5.100 109.0	46-50-24 122-15-27	7.3	189.73 24.73	165 CLEAR
KAKT LIC	PHOENIX OR	BLH-901001KD	286C1 105.1	52.000 166.0	42-25-41 123-00-04	186.6	304.08 34.08	270 CLEAR
KRSK LIC	SALEM OR	BMLH-990521KA	286C 105.1	100.000 576.0	45-00-35 122-20-17	129.3	24.19 -265.81	290 SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 270 KM								
KRSK APP	SALEM OR	BPH-951215ID	286C 105.1	100.000 439.0	45-11-00 122-30-00	56.1	7.17 -282.83	290 SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 270 KM								
KRSKaux CP	SALEM OR	BXP-000112ABM	286C 105.1	100.000 516.0	45-00-35 122-20-17	129.3	24.19 0.00	0 AUX

SEARCH PARAMETERS

FM Database Date: 001010

Channel: 286C 105.1 MHz

Page 2

Latitude: 45 8 51

Longitude: 122 34 33

Safety Zone: 50 km

Job Title: KRSK APPLICATION BPH-19951215ID

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KONA-FM LIC	KENNEWICK WA	BLH-940525KA	287C 105.3	100.000 347.0	46-05-51 119-11-30	66.9	284.27 43.27	241 CLEAR
KONAaux LIC	KENNEWICK WA	BLH-940812KZ	287C 105.3	10.000 301.0	46-05-51 119-11-30	66.9	284.27 0.00	0 AUX
KONA-FM APP	KENNEWICK WA	BPH-980911IB	287C 105.3	100.000 441.0	46-05-58 119-07-40	67.2	288.98 47.98	241 CLEAR
KONAaux APP	KENNEWICK WA	BPH-980911ID	287C 105.3	10.000 389.0	46-05-58 119-07-40	67.2	288.98 0.00	0 AUX
KDEP CP MOD	DEPOE BAY OR	BMPH-960910IA	288C3 105.5	3.000 291.0	44-45-24 124-02-50	249.9 SS	123.97 27.97	96 CLEAR
KCGB-FM LIC	HOOD RIVER OR	BLH-781124AB	288A 105.5	3.000 -140.0	45-42-07 121-32-10	52.4	102.07 7.07	95 CLOSE
K288DI LIC	LINCOLN CITY OR	BLFT-860516TC	288D 105.5	0.054 DA 300.0	44-52-30 123-59-00	255.2	115.02 0.00	0 TRANS
K288EC LIC	SWEET HOME OR	BLFT-871229TG	288D 105.5	0.051 DA 923.0	44-29-02 122-34-55	180.4	73.75 0.00	0 TRANS
KLYK LIC	LONGVIEW WA	BLH-941228KE	288A 105.5	0.700 262.0	46-09-52 122-51-13	349.3 SS	115.08 20.08	95 CLEAR
KLYK APP	LONGVIEW WA	BPH-960129IC	288A 105.5	6.000 -17.0	46-05-01 122-55-11	345.7	107.44 12.44	95 CLEAR
KLYK APP	LONGVIEW WA	BPH-960129IC	288A 105.5	6.000 100.0	46-05-01 122-55-11	345.7	107.44 12.44	95 CLEAR
KQAK LIC	BEND OR	BLH-000414ACD	289C1 105.7	40.000 180.0	44-04-40 121-19-49	139.9	154.61 49.61	105 CLEAR
KQAK CP	BEND OR	BPH-000414ACF	289C1 105.7	40.000 180.0	44-04-40 121-19-49	139.9	154.61 49.61	105 CLEAR
K289AC LIC	NEDONNA BEACH OR	BLFT-940711TA	289D 105.7	0.001 DA 501.0	45-44-38 123-56-24	302.4	125.63 0.00	0 TRANS

===== BEGINNING SEARCH OF SECONDARY DATABASE =====

SEARCH PARAMETERS

FM Database Date: 001010

Channel: 286C 105.1 MHz

Page 3

Latitude: 45 8 51

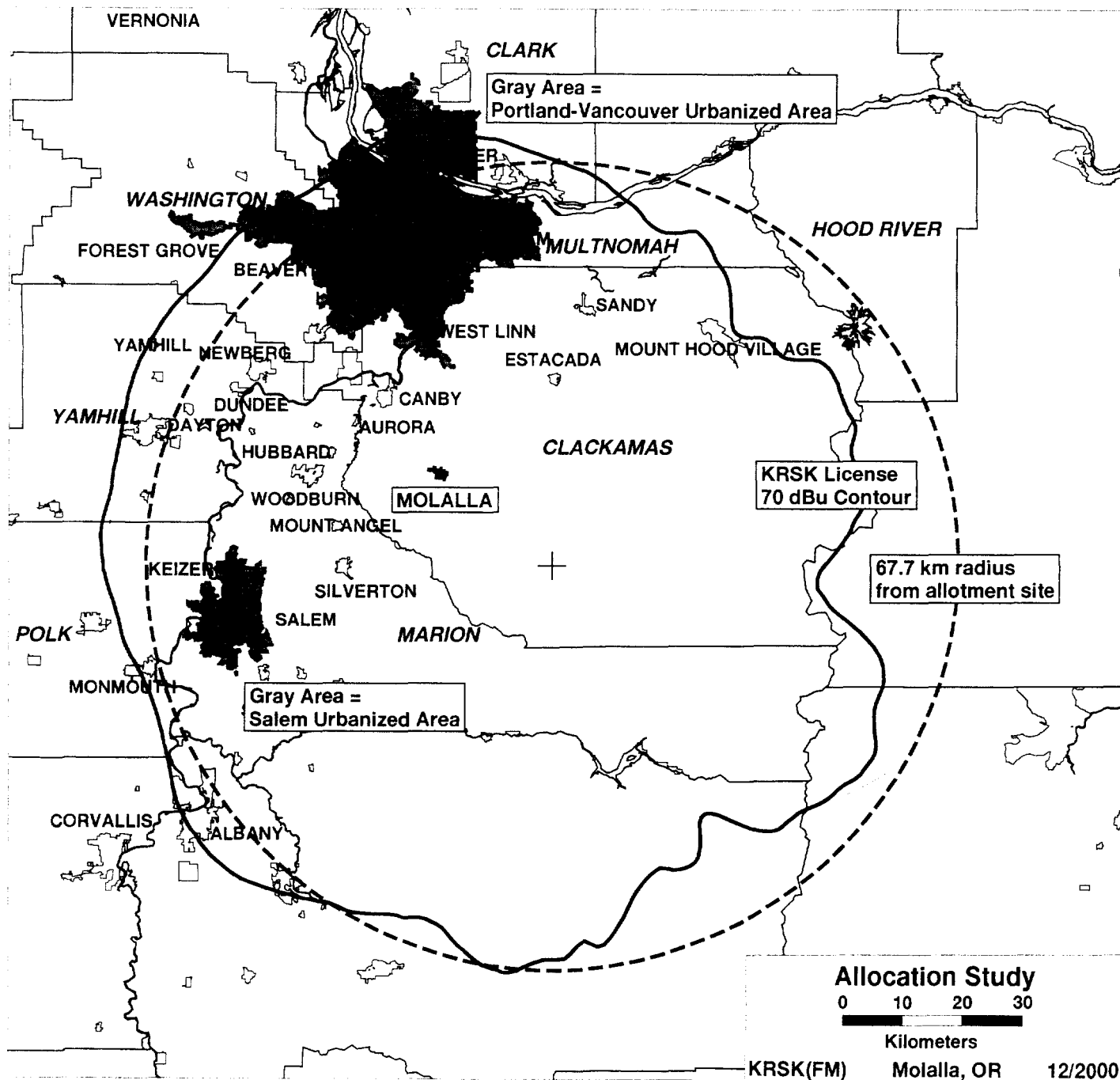
Longitude: 122 34 33

Safety Zone: 50 km

Job Title: KRSK APPLICATION BPH-19951215ID

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KFNK	EATONVILLE		285C3	0.000	46-50-19	8.7	190.23	176
VACANT	WA	RM-9269	104.9	0.0	122-11-53		14.23	CLEAR

==== END OF FM SPACING STUDY FOR CHANNEL 286 =====



Statement of Engineer

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments to reallocate Channel 286C from Salem to Molalla, Oregon, has been prepared on behalf of Entercom Portland License, LLC. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 11th day of December, 2000.



Benjamin F. Dawson III, P.E.

Hatfield & Dawson Consulting Engineers